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Supreme Court, U.S.
FILED
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JOSEPH F. SPANIOL, JR.
CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1988

No. 88-1182

88-6651

BALTIMORE CITY DEPARTMENT OF SOCIAL SERVICES,

Petitioner,

v.

JACQUELINE BOUKNIGHT,

Respondent.

BRIEF IN OPPOSITION TO
PETITION FOR WRIT OF CERTIORARI

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The Petitioner, Jacqueline Bouknight, who is indigent and who has been found to meet the qualifications for representation by the Office of the Public Defender for the State of Maryland, asks leave to file the attached Brief in Opposition to the Court of Appeals of Maryland without prepayment of costs and to proceed in forma pauperis pursuant to Rule 46.

The Petitioner's Affidavit in support of this Petition is attached hereto.

George E. Burns, Jr.
Assistant Public Defender
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201 St. Paul Place
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(301) 333-4842

Counsel for Petitioner

IN THE

SUPREME COURT OF THE UNITED STATES

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BALTIMORE CITY DEPARTMENT OF
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JACQUELINE BOUKNIGHT,

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BRIEF IN OPPOSITION TO
PETITION FOR WRIT OF CERTIORARI

AFFIDAVIT IN SUPPORT OF MOTION TO PROCEED ON APPEAL IN FORMA PAUPERIS

I, Jacqueline Bouknight, being first duly sworn, depose and say that I am the Respondent in the above-entitled case; that in I am unable to pay the costs of said proceeding, and that I believe I am entitled to redress.

I further swear that the responses which I have made to the questions and instructions below relating to my ability to pay the cost of prosecuting the appeal are true.

1. Are you presently employed?

(a) If the answer is yes, state the amount of your salary or wages per month and give the name and address of your employer.

(b) If the answer is no, state the date of your last employment and the amount of the salary and wages per month which you received.

2. Have you received within the past twelve months any income from a business, profession or other form of self-employment, or in the form of rent payments, interest, dividends, or other source?

(a) If the answer is yes, describe each source of income and state the amount received from each during the past twelve months.

3. Do you own any cash or checking or savings accounts?

4. Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)?

(a) If the answer is yes, describe the property and state its approximate value.

5. List the persons who are dependent upon you for support and state your relationship to those persons.

I understand that a false statement or answer to my questions in this affidavit will subject me to penalties for perjury.

Jacqueline Bouknight

Subscribed and sworn to before me, a Notary Public this 10 day of February, 1989.

NOTARY PUBLIC

My Commission Expires: July 1, 1990

Let the applicant proceed without prepayment of costs or fees or the necessity of giving security therefore.

JUSTICE

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1988

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SOCIAL SERVICES,

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v.

JACQUELINE BOUKNIGHT,

Respondent

**BRIEF IN OPPOSITION TO
PETITION FOR WRIT OF CERTIORARI**

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ISSUE PRESENTED

Where Respondent is being investigated for the suspected homicide of her child, does the right against self-incrimination bar the juvenile court from incarcerating Respondent to compel her to produce her child or disclose his whereabouts?

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1988

No. 88-1182

BALTIMORE CITY DEPARTMENT OF SOCIAL SERVICES,

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v.

JACQUELINE BOUKNIGHT,

Respondent

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

The Respondent, by her attorneys, George E. Burns, Jr., Jose' Felipe' Anderson, and George M. Lipman, Assistant Public Defenders, requests that the petition for writ of certiorari be denied.

STATEMENT OF THE CASE

The basic facts are set forth in the Petition for writ of certiorari and the opinion of the Court of Appeals included in the appendix to the petition. The following facts are set forth by way of amplification.

Pursuant to a finding that Respondent's child, Maurice, was in need of assistance, the Baltimore City Department of Social Services agreed that Maurice should remain in his mother's custody with the following conditions:

> 1. Baltimore City Department of Social Services shall submit progress reports every six months.
>
> 2. Mother shall cooperate with BCDSS.
>
> 3. Mother shall continue in therapy until discharged.
>
> 4. Mother shall attend center for infant studies at University of Maryland until discharged.
>
> 5. Mother shall continue to utilize services of parent aid as provided by BCDSS.
>
> 6. Mother shall refrain from physically punishing the Respondent. (App.46-47).

This order was agreed to on August 18, 1987. Petitioner's supervision following this order was summarized by the Court of Appeals.

> There was evidence that DSS representatives had not seen Maurice since September 4, 1987; that the DSS aide's efforts to see Maurice were thwarted by Jacqueline's statements that the child was not at home; and that Jacqueline had told police that Maurice was in the care of an aunt, but that the aunt had denied seeing Maurice. (Petitioner's Appendix at 19a. n.2).

According to the summary of progress prepared by Petitioner, Petitioner took increased interest in the case in March, 1988. (App.33-34). As a result by April 15, 1988, the following entry appears:

> T/C [telephone call] from Officer Klein at 4 p.m.; Officer Klein to refer case to Homicide to Sgt. Landsmann. (396-2721). Ms. Louise Perry had never seen the baby. Case looks kinky. Officer thinks Ms. Bouknight did something that has hurt Maurice. (App.37).

Similarly, on April 18, 1988, it was noted:

> T/C to Det. James Jones; nothing new on case. Worker suggested photograph of mother and to accompany Det. Jones. Det. Jones stated he would rely on cooperation of Ms. Bouknight. Worker emphasized the possibility of this being a murder case. (App.38).

An entry for April 21, 1988, leaves no doubt that a "homicide" is being investigated.

> T/C to Det. James Jones; Det. Jones advised that case should be regarded as a homicide and that no responsible employee of city or hospital had seen the child. (App.40).

The point was reiterated on April 26, 1988:

> T/C with Dot Rosinski, Chief of PS; Dot Rosinski to contact Youth Division of BCP on morning of 4.27.88 to request that greatest attention be given to the matter as it is a possible homicide. (App.41).

Again on May 4, 1988, it is noted that:

> T/C from Detective James Jones of the Youth Section, Baltimore City Police 396-2042. Detective Jones requesting worker to meet with Detective Richard Falhteich of Homicide Division of Baltimore City Police (9:50 a.m.) 11:00 a.m. - Interview of worker by Detective Richard

> Fahlteich of Homicide, Baltimore City Police at 500 East Baltimore Street, 396-2721. (App.43).

The contempt proceedings themselves also reflect the interrelationship between the contempt action and the homicide investigation. Indeed, the petition seeking contempt states that "this case was referred [to] the Homicide Division for further investigation due to concern over the welfare of the Respondent [Maurice]." (App.48).

At the hearing on April 20, 1988, the hearing judge observed that:

> "The child representative, Ms. Watts, has joined in with the Department of Social Services. Apparently, a decision was made to terminate the foster care relationship even in light of the finding by Dr. Eisenberg that it is not recommended that she regain custody of the child, because it does not appear that she is emotionally capable of providing the protection, nurturance, and care that would be required for the child's safety and security.
>
> So, she is in need of intensive and extensive intervention both on emotional and social levels to help her deal with not only her own internal issues but also those requirements for independent and self-sufficient functioning. What that tells me is we have a lady in severe crisis here. We also possibly have a dead child somewhere which just depresses me to no end, I am not going to kid you.
>
> Since Master Price has recommended the issuance of a warrant, and I have to sign the warrant, I am going to sign the warrant. I'd like to get in touch with somebody in the Police Department to have them go out and take a look into this situation as rapidly as possible. (App.19-20).

The judge was then informed that Petitioner "had a Homicide detective downstairs in Juvenile Court." (App.20).

After the judge had ordered the arrest of Respondent, counsel for Petitioner counseled:

> "Your Honor, if it would be possible too, if the police were sent out, Dr. Eisenberg was concerned that this girl not be treated in any kind of threatening way. He said emotionally, she is functioning at about an eight to ten year old level. So, he feels, especially with the suicide threat she has made, which he thinks we all should take very seriously, he thought the best thing to do was to deal with her as if she were a ten year old child, a very non-threatening kind of approach.
>
> I don't know what happens when the police go out and pick someone up. But if they could be made aware of, if we ever expect to find out what happened with the child, that we're going to have to treat this lady very gently, I think. (emphasis added)(App.21-22).

REASONS FOR DENYING THE WRIT

No matter what else it may be doing, the State is, based on the record in this case, conducting a homicide investigation with Respondent as the chief suspect and her son as the probable victim. As noted by the Supreme Judicial Court of Massachusetts, whatever the exact reach of the right against self-incrimination, an attempt to make a defendant "deliver the corpus delicti" implicates the core of the protection afforded by the right.[1] Commonwealth v.

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[1]Whether respondent is actually guilty of homicide or any other crime is irrelevant.

> At the outset we must condemn the practice of imputing a sinister meaning to

Hughes, 404 N.E.2d 1239 (Mass. 1980), cert. denied, 449 U.S. 900 (1980). See also L. Levy, Origins of the Fifth Amendment 427 (2d ed.1969).[2] The right against self-incrimina-

---

> the exercise of a person's constitutional right under the Fifth Amendment. The right of an accused person to refuse to testify, which had been in England merely a rule of evidence, was so important to our forefathers that they raised it to the dignity of a constitutional enactment, and it has been recognized as 'one of the most valuable prerogatives of the citizen.' We have reaffirmed our faith in this principle recently in Quinn v. United States, 349 U.S. 155, 99 L.ed.964, 75 S.Ct.668. In Ullman v. United States, 350 U.S.422, 100 L.ed.511, 76 S.Ct.497, decided last month, we scored the assumption that those who claim this privilege are either criminals or perjurors. The privilege against self-incrimination would be reduced to a hollow mockery if its exercise could be taken as equivalent either to a confession of guilt or a conclusive presumption of perjury. As we pointed out in Ullmann, a witness may have a reasonable fear of prosecution and yet be innocent of any wrongdoing. The privilege serves to protect the innocent who otherwise might be ensnared by ambiguous circumstances. Slochower v. Board of Education of New York, 350 U.S. 550, 557-558 (1956).

Faced with suspicious social workers and police, someone in Respondent's position might reasonably "be ensnared by ambiguous circumstances" if, for example, her son were no longer in existence even though through no fault of Respondent.

[2]The Massachusetts Court in Hughes did nothing more than apply the principles of the Fifth Amendment privilege against self incrimination as so aptly noted by Chief Justice Rehnquist in Michigan v. Tucker, 417 U.S. 433, 440 (1974).

> At this point in our history virtually every schoolboy is familiar with the concept, if not the language, of the provision that reads: "No person ... shall be compelled in any criminal case to be witness against himself..." This Court's

tion would mean little if it did not protect a homicide suspect from being forced to be a witness for the State.

Petitioner's claim that this case does not involve "testimonial" evidence and therefore does not implicate the right against self-incrimination is also unavailing. Respondent does not have a duty to incriminate herself. Therefore, it is Petitioner's burden to show that there is a

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> decisions have referred to the right as "the mainstay of our adversary system of criminal justice," Johnson v. New Jersey, supra, at 729, 16 L Ed 2d 882, and as "'one of the great landmarks in man's struggle to make himself civilized.'" Ullman, supra, at 426, 100 L Ed 53 ALR2d 1008. It is not surprising that the constitution of virtually every State has a comparable provision. 8 J. Wigmore, Evidence §2252 (McNaughton rev 1961) (hereinafter Wigmore).
>
> The importance of a right does not, by itself, determine its scope, and therefore we must continue to hark back to the historical origins of the privilege, particularly the evils at which it was to strike. The privilege against compulsory self-incrimination was developed by painful opposition to a course of ecclesiastical inquisitions and Star Chamber proceedings occurring several centuries ago. See L. Levy, Origins of the Fifth Amendment (1968); Morgan, The Privilege Against Self-Incrimination, 34 Minn L Rev 1 (1949); 8 Wigmore §2250. Certainly anyone who reads accounts of those investigations, which placed a premium on compelling subjects of the investigation to admit guilt from their own lips, cannot help but be sensitive to the Framers' desire to protect citizens against such compulsion. As this court has noted, the privilege against self-incrimination "was aimed at a ... far-reaching evil -- a recurrence of the Inquisition and the Star Chamber, even if not in their stark brutality."

means by which she can both purge her contempt and not incriminate herself. Thus, this Court has noted that, among other things, the right against self-incrimination reflects "our unwillingness to subject those suspected of crime to the cruel trilemma of self-accusation, perjury or contempt." Murphy v. Waterfront Commission of New York, 378 U.S. 52, 55 (1964). See also Kastigar v. United States, 406 U.S. 441, 444 (1972).

If the child is dead and gone, as the police authorities apparently believe, this is impossible. If Respondent were, for example, to tell her counsel that the child was deceased and missing under suspicious circumstances, the communication would be privileged and not purge the contempt. An anonymous call conveying the same information would also obviously fail to purge the contempt. In sum, there is no way that Respondent can both purge the contempt and avoid a reasonable risk of self-incrimination.

Petitioner's alternative claim is that because a child is involved the Fifth Amendment should be "balanced" out of existence. The starting point for analysis of this claim has been provided by this Court.

> "But claims of overriding interests are not unusual in Fifth Amendment litigation and they have not fared well." Lefkowitz v. Turley, 414 U.S. 70, 78 (1973).

The reason for this failure is clear.

> "We have already rejected the notion that citizens may be forced to incriminate themselves because it serves a governmental need." Lefkowitz v. Cunningham, 431 U.S 801 (1977).

Petitioner's attempt to circumvent these principles rests primarily on a misreading of the plurality opinion in California v. Byers, 402 U.S. 424 (1971). In Byers this Court considered the effect of a California statute requiring that a motorist involved in an automobile accident not leave the scene and supply his name and address.

The plurality first noted that the statute was not aimed at a group particularly suspected of criminal activity. It further noted that the acts required were "neutral" and other purposes to be served were "always subject to the driver's right to assert a Fifth Amendment privilege concerning specific inquiries." Id. at 433.

In the case at bar, a single individual is being investigated for homicide and is being ordered to disclose the whereabouts of the supposed victim. Byers involved a neutral state regulation; this case involves preparation for a prospective homicide prosecution. There is no similarity between the two cases.[3]

---

[3]The kindred claim that the juvenile court is powerless unless it can incarcerate Respondent for civil contempt is disingenuous. As noted by the Court of Appeals, the failure to produce the child may constitute a separate statutory crime. (Petitioner's Appendix at 420, n.3). Thus, there are means of enforcing the juvenile court's order without depriving Respondent of her Fifth Amendment rights. See Curcio v. United States, 354 U.S 118 (1957).

Petitioner's waiver arguments are frivolous. At one point Respondent (not under oath) said the child was in Dallas. According to Petitioner, this "statement" "waives" the right against self-incrimination. Reliance is placed on Rogers v. United States, 340 U.S. 367 (1951). In Rogers, a witness freely admitted to her membership in the Communist Party. She refused, however, to name another person who had received Party records. This Court noted that under these circumstances she could not be further incriminated by answering the subsequent questions. This conclusion was not based on waiver.

> Requiring full disclosure of detail after a witness freely testifies as to a criminating fact does not rest upon a further 'waiver' of the privilege against self-incrimination. Admittedly, petitioner had already 'waived' her privilege of silence when she freely answered criminating questions relating to her connection with the Communist Party. But when petitioner was asked to furnish the name of the person to whom she turned over Party records, the court was required to determine, as it must whenever the privilege is claimed, whether the question presented a reasonable danger of further crimination including any previous disclosures. As to each question to which a claim of privilege is directed, the court must determine whether the answer to that particular question would subject the witness to a 'real danger' of further crimination. After petitioner's admission that she held the office of Treasurer of the Communist Party of Denver, disclosure presents no more than a 'mere imaginary possibility' of increasing the danger of prosecution.

Id. at 374-275.

Even ignoring the crucial fact that Respondent never testified, Rogers does not support Petitioner's theory. Merely saying the child is in Dallas does not incriminate Respondent to an extent that there can be no "further crimination" in relation to crimes such as murder, assault and child abuse.

The second aspect of the "waiver" theory is that by accepting custody of the child Respondent "waived" any subsequent claim of self-incrimination. "A waiver is ordinarily an intentional relinquishment or abandonment of known right or privilege." Johnson v. Zerbst, 304 U.S. 458, 464 (1938). See also Smith v. United States, 337 U.S.137 (1949). The order with its conditions are set forth in the Statement of the Case and contains not a word about self-incrimination. Indeed, if this "agreement" gives notice of a "waiver" of self-incrimination, it equally gives notice of a waiver of the protection against cruel and unusual punishment and the right to free speech. The waiver contentions do not merit consideration by any court, much less this Court.

CONCLUSION

The facts of this case are admittedly interesting. Nevertheless, ignoring Petitioner's hysteria, there is nothing to justify review by this Court. Regrettably, every day there are prosecutions for child abuse and related offenses. However, this unfortunate state of affairs does

not justify abrogating the accused's right not to incriminate herself. Similarly, suspected homicides where the victim cannot be found have long plagued the criminal law, but, once again, the problem is not a basis for depriving suspects of a constitutional protection. Petitioner's rationale for contending that Respondent can be held in contempt is that when the missing victim is a juvenile even the most fundamental constitutional protection must fall. This claim is without historical or analytical support. The petition should be denied.[4]

Respectfully submitted,

George E. Burns, Jr.
Assistant Public Defender

Jose' Felipe' Anderson
Assistant Public Defender

George M. Lipman
Assistant Public Defender

Counsel for Respondent

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[4]The Legal Aid Bureau of Maryland has also filed a petition (in behalf of Maurice) in this case. At pages 18-19 of this petition it is argued, in effect, that Respondent did not properly preserve her federal claim for appellate review. The frivolity of this argument was demonstrated in the Court of Appeals. However, at this stage in the proceedings it is sufficient to note that the argument does not raise a federal question. "There can be no question as to the proper presentation of a federal claim when the highest state court passes on it." Raley v. Ohio, 360 U.S. 423, 436 (1959). See also Burch v. Louisiana, 441 U.S. 130, 133 n.5 (1979).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of February, 1989, three copies of the foregoing Petition were delivered to Ralph Tyler, Assistant Attorney General, Office of the Attorney General, The Munsey Building, 7 North Calvert Street, Baltimore, Maryland 21202 and to Susan Dishler Shubin, Esq., Legal Aid Bureau, Inc., 714 East Pratt Street, 7th Floor, Baltimore, Maryland 21202.

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Assistant Public Defender
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Attorney for Appellant

APPENDIX

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IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

DIVISION FOR JUVENILE CAUSES

IN THE MATTER OF:

MAURICE M_____

Born October 3, 1986 Petition No. 8870427

_____/

REPORTER'S OFFICIAL TRANSCRIPT OF PROCEEDINGS

Baltimore, Maryland

April 20, 1988

BEFORE:

HONORABLE EDWARD J. ANGELETTI, Judge

APPEARANCES:

MARILYN E. BLIMLINE, ESQUIRE
Staff Attorney
On behalf of Department of Social Services

LISA WATTS, ESQUIRE
Legal Aid Bureau
On behalf of the Respondent Child

ROBIN PARSONS, ESQUIRE
Assistant Public Defender
On behalf of the Mother

CAROL J. ROBINSON
Official Court Reporter
507 Clarence Mitchell Courthouse
Baltimore, Maryland 21202

PROCEEDINGS

THE COURT: Now, we have this matter from Juvenile Court. Sheriff, keep the door closed. Don't let anyone in the courtroom.

Let the record reflect that the courtroom is empty except for the juvenile clerk and the Juvenile Court personnel involed in the present case.

The matter before the Court is the matter of Maurice M____, Division for Juvenile Causes, Petition Number 88704202. It is a motion by the Department of Social Services for Baltimore City through Ms. Marilyn Blimline, their attorney, for a finding of contempt and for the Issuance of an Order to Show Cause. The Court has carefully read and considered the Motion for Contempt and the Petition for the Issuance of an Order to Show Cause.

Basically, what has happened, the child who is the subject of these proceedings, Maurice M____, was born on October 3, 1986. After investigating reports of physical abuse and having confirmed those reports, the mother of the child, Miss Jacqueline Bouknight -- is she present?

MS. BLIMLINE: No, she is not, Judge.

THE COURT: She had custody of the child taken from her, and the child was placed in foster

care under the Baltimore City Department of Social Services. There were several hearings at the last hearing. Master Mitchell returned the child to his mother pending disposition. That was on July 17 of 1987. A dispositional hearing was held on August 18, 1987, and the child was found to be a Child in Need of Assistance and placed under protective order and placed with the mother.

The mother has failed to comply with any of the requirements of that order, and on April 7, a home visit was made. The petitioner was advised, the petitioner being the Baltimore City Department of Social Services, that the child was in the care of an aunt, but she refused to identify the aunt or provide the whereabouts.

The following day, attempts were made to locate the mother through various relatives, all without success. The Baltimore City Police were contacted on April 2. A Missing Persons report was made. The mother told the investigating officer that an aunt by the name of Louise Perry had the child, and Miss Perry denies this, but she said she didn't see the child, that she didn't see her.

Baltimore City Homicide detectives were contacted, and they are apparently in the process now

of conducting an investigation concerning the welfare of the child. Miss Bouknight had apparently informed Miss Blimline that she intends to kill herself following the hearing today which was scheduled in the Juvenile Court. Does that sum up everything that has occurred?

MS. BLIMLINE: Yes, Your Honor. She made the statement, however, to the social worker, Phil Maguire.

THE COURT: Would all the parties who are present in court identify themselves?

MS. BLIMLINE: Marilyn Blimline representing the Baltimore City Department of Social Services.

MS. WATTS: Lisa Watts, Legal Aid Bureau, representing the Respondent child, Maurice M___.

THE COURT: May I have your name again?

MS. WATTS: My name is Lisa Watts from the Legal Aid Bureau.

THE COURT: Lisa Watts?

MS. WATTS: Right.

THE COURT: Ms. Watts, you represent the child?

MS. WATTS: That is correct.

THE COURT: All right.

MRS. PARSONS: Robin Parsons, Public Defender's Office, Assistant Public Defender representing the mother whose name is Jacqueline Bouknight.

THE COURT: Can you tell me where the mother is?

MS. PARSONS: Your Honor, I had contact from the mother. She called me a couple of days ago to tell me that Mr. Maguire, the social worker, was going to be filing this Missing Persons report. And she told me at that time that she has been in school and during the time she has been in school, she has left the child with a friend or relative, I can't recall.

She said, "I have to take a day off from school in order to have the child so he can come to see the child, and I have been trying to reach him and have not been able to reach him to come over and see the child." So, I said, "Well, it sounds simple enough. You are off school today. Why don't you just call him and I will call him." But I was unable to reach him. But I said, "We'll both call him and have him come over and see the child, and that would be the end of the matter."

Apparently, that didn't happen. Today I

have spoken with my client. I spoke with her this morning, told her we were going to have the matter heard this afternoon. The problem is, nobody has seen the baby. I said, "We need to see the baby. There is a concern about the baby." I said, "Be here at one o'clock sharp with the baby." And she said she would be here. She is not here.

I have talked with, I guess it is a friend, the number where the mother can be reached, and the friend said she saw the mother with the baby leaving ostensibly for court a little before noon. And she said she saw the baby with the mother. She was quite definite about it. That is the only information I have. The mother is now, it is almost 3 o'clock, and the mother is not here. She had to take the bus, but I don't suspect that is going to take three hours.

MS. BLIMLINE: Your Honor, in regards to the review hearing that was scheduled before Master Teaette Price this afternoon, that was postponed, a bench warrant was issued for the mother, and a shelter care order on Maurice, the Respondent, to the Department of Social Services.

The Department is very concerned, because although Ms. Parsons spoke on the phone with someone

who assured her they saw the baby this morning, we failed to get that persons's name. We don't know who she was talking to.

The social worker, Phillip Maguire, who is present in the courtroom today last saw the child on September 4, 1987. He has been in touch with all of the relatives in Baltimore he can locate and even some out-of-state relatives. And to date, he has not been able to find anyone who has seen the child or who will consistently say they have seen the child any later than, well, one aunt, a maternal aunt said she saw the child and mother on the street in February. Other than that, it seems no one in the family has seen the child since summertime.

So, we're very concerned. This is a very serious abuse case involving a child who at the time was only six months old and involved about three fractures, one being of the femur, which is a pretty difficult bone to break on a six-month-old.

I spoke with the psychologist who examined and evaluated this lady prior to the dispositional hearing --

MS. PARSONS: I am going to object to that. I don't believe that's relevant to the matter today.

THE COURT: Well, I am conducting a hearing to try to find out where Maurice M___ is, and I think it is important that the Court be apprised of any evidence that would tend to shed light on that situation. So, I overrule the objection.

MS. BLIMLINE: Your Honor, I spoke with a doctor who examined and evaluated this lady prior to the dispositional hearing. That was Dr. Joseph Eisenberg. He is very concerned about the safety of the minor child. He is concerned that perhaps the child is now dead or injured so severely that the mother has hidden the child. And I have a copy of his report which was not entered into evidence at the time of the dispositional hearing, but I would like the Court to be aware of it at this time, and I would like this entered.

MS. PARSONS: I object to this. This concerns evidence that could have been presented prior to disposition which was way back in August. It has nothing to do with the present whereabouts of this baby.

MS. BLIMLINE: Your Honor, it couldn't have been presented prior to disposition, because the Department of Social Services did not receive a copy

of this until after the dispositional hearing.

MS. PARSONS: It has nothing to do with the whereabouts of the baby.

THE COURT: If what that doctor says is accurate, Ms. Parsons, then what? Suppose the baby is so seriously injured or dead? What am I supposed to do? Say it is not relevant?

MS. PARSONS: Your Honor, there is no evidence or no indication anything is wrong with the baby.

THE COURT: Where is the baby? Bring me the baby. If I see the baby is okay, fine. I am hapy. But somebody has to protect that child. Based on what I have already heard, this child is in serious jeopardy. Let me hear from Ms. Watts. Let me see that report, please.

MS. WATTS: Your Honor, I would basically be in agreement with Ms. Blimline's position, The fact the mother has not complied with the conditions of the order of protective supervision, the fact that many of the relatives have not seen the baby for quite some time now, and also the report that she is referring to from the doctor which also has concern about mother's ability to care for this child. Additionally, mother was supposed to show up this.

afternoon, and she has not appeared.

So, I would support the Department's position, and I do have concerns about the whereabouts of this child.

THE COURT: Ms. Parsons, have you shared the information that you have as to the whereabouts of your client with other counsel?

MS. PARSONS: Yes, and also with Master Price earlier this afternoon.

THE COURT: You did speak with Miss Bouknight today?

MS. PARSONS: Yes.

THE COURT: Are you sure it was Miss Bouknight you spoke with?

MS. PARSONS: Yes.

THE COURT: You have spoken with her on the phone before? You recognize her voice?

MS. PARSONS: Yes. I have been on this case since February 1987. I have spoken with her a number of times, and I am quite sure it was she with whom I was speaking. Also, as I said, I spoke with her several days ago. She called me. She called me several times and left messages. I got back to her, and we spoke about this. And I had no reason to think and still don't have any reason to believe

there is anything wrong. She didn't seem upset or panicked in any way. It sounded as if she were certainly intending to be here on time. She was very clear that she would be here at one o'clock.

THE COURT: She fooled all of us including you, didn't she?

MS. PARSONS: Well, I am not so sure. There may be something that happened along the way that may have prevented her from being here.

THE COURT: Like something happening to this child. How long has it been since you've seen the child?

MS. PARSONS: I have not seen the child since we were last in court.

THE COURT: In September of last year.

MS. PARSONS: But the individual that I spoke with said she had seen the child just a few hours ago with the mother.

THE COURT: Do you know that person?

MS. PARSONS: No.

THE COURT: Did you ever meet that individual in person?

MS. PARSONS: No.

THE COURT: So, you have no way of determining who that person even is.

MS. PARSONS: Well, I could call the number and ask. I have spoken with her not once but about four times today. That's the only way of contacting the mother is through this number she gave me of a friend. And I have spoken with the friend at least four times. I have been calling all day.

THE COURT: Well, that would indicate to this court that you are as concerned about this child as Ms. Blimline and Ms. Watts.

MS. PARSONS: No, Your Honor, I just wanted to be sure that my client appeared and did what she was supposed to so she could continue to have her child in her custody. That is my concern, because obviously, she wants to continue taking care of her child and going to school.

THE COURT: What school is she going to?

MS. PARSONS: I am not sure.

THE COURT: Do you have the name of the school or the type of school?

MS. PARSONS: No, I don't, just that she said she was in school.

THE COURT: She said she was in school. She is how old? 21 and a half? She will be 22 in June?

MS. PARSONS: Right.

THE COURT: You don't have any idea what school she is going to. Has anyone else been able to tell you that?

MS. PARSONS: No.

MS. BLIMLINE: Your Honor, if I could point out too, this mother came through the juvenile system. She has an extensive psychiatric history dating back to the time when she was four years old. I have copies of that. I don't think it is necessary to take up the Court's time to have you read them right now, but she has some serious problems.

Also, the mother herself is not hiding from the Department. The social worker saw her yesterday. But she is refusing to divulge the whereabouts of the child to the worker or to the police or to the Homicide detective who recently became involved.

THE COURT: We'll issue -- who issued a warrant for this lady?

MS. PARSONS: Master Price did about an hour ago.

THE COURT: She submitted that warrant to Judge Mitchell for approval.

MR. NEAL: Michael Neal, Juvenile Court Administrator. Judge Mitchell is on jury duty today.

The warrant is being processed now. I will be bringing the warrant to you for signature.

MS. BLIMLINE: There is also a Missing Persons already out on the baby that has not produced the baby yet and the shelter care to the Department on the infant.

THE COURT: What was the reason that the shelter care was terminated last year?

MS. BLIMLINE: The shelter care expired at the time of disposition.

THE COURT: Why was it permitted to expire? That is what I want to know.

MS. BLIMLINE: On July 17, 1987, when Master Mitchell ordered shelter care in the home of the mother, the Department opposed that at that time. However, an exception was not filed. I can't explain why it was not. I was not the attorney of record. I have no idea. At the time of disposition, I should point out to the Court that the parties entered into a stipulation for order of protective services as opposed to commitment.

So, the parties were in agreement at the time, but keep in mind this is without the benefit of Dr. Eisenberg's psychological evaluation, they were in agreement the child should be home.

The child, in all fairness to the mother, evidently, she has been doing fairly well up until last month when the child's father was killed. Evidently, it was a drug killing. And something has happened to this young mother since that time. People who have seen her think she has not been quite right since the killing.

THE COURT: Ms. Watts, do you have anything further you are offering to the Court?

MS. WATTS: No, I don't, only I recently have acquired this case. I was not the attorney for the child when the case first came in last year. So, I wouldn't know how to answer that.

MS. BLIMLINE: Your Honor, I would also like to ask the Court that if it is possible, when this lady is picked up, if she is ever picked up by the police, that she receive a psychiatric evaluation to in some way judge her ability to provide care for this child now.

THE COURT: Well, Mr. Conti from Medical Services is prsent in the courtroom.

MS. PARSONS: Your Honor, we would be opposed to that. Until the mother is located and until there is some evidence, some reason to believe there is something wrong with her or the baby, or

both, I would oppose any ordering of the psychological or psychiatric.

MS. BLIMLINE: Your Honor, I think there is more than enough reason to suspect that something is wrong. She failed to appear today. Ms. Parsons pointed out to her our concern, many people's concern, that the baby is dead. So, I think she has indicated by her failure to appear there is definitely something wrong. Whether that be with the child's health or welfare or whether that be with her own emotional health, I don't know.

THE COURT: What is the quickest way we can get ahold of this lady physically?

MS. BLIMLINE: I would suggest the police send, that you send the police out to see if you can pick her up at the home where Ms. Parsons contacted her earlier this morning. The social worker has an extensive list of addresses for relatives. I think if the police made a concerted effort to seek her out at all those relatives' homes, I think that would perhaps be a good idea.

I am really concerned about the passage of every day that this child -- I just received this case the day before yesterday. But after speaking with Dr. Eisenberg last night on the phpone, to say

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that he was extremely concerned about the child's wellbeing is putting it very, very mildly. I think we need to do whatever can be done to try to locate the mother and the child.

Your Honor, I also have copies of the medical reports that deal with the child's injuries at the time this first came before the Juvenile Court if you would like to see those.

THE COURT: Can you highlight those injuries for the Court so that Mr. Conti is aware of them, please?

MS. BLIMLINE: I shared these with Mr. Conti earlier yesterday.

THE COURT: Mr. Conti, you are aware of all of this?

MR. CONTI: Quite aware.

THE COURT: Are you aware of Dr. Eisenberg's position dated July 27, that he is concerned about the safety of the child?

MR. CONTI: Yes.

THE COURT: What would your view be of all this, Mr. Conti, based on your knowledge of the circumstances?

MR. CONTI: My belief after reading the material is that if this individual is arrested, she

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is unquestionably in need of urgent evaluation because of the potential possibility of harming herself. When I learned earlier this afternoon that apparently Master Price issued a warrant -- is that correct?

MS. BLIMLINE: Yes, it is.

MR. CONTI: -- I called Baltimore City Jail in fact to be sure she would be handled special if she came in today. I would suggest that if this court takes some other kind of action, that I would leave my private office answering service number so that I may at least be in touch to see that she receives any special handling she might need after her arrest. I see this as an individual in a crisis simply from the paperwork.

MS. PARSONS: Your Honor, I'd like to underscore he has not met my client. He has information he has only read and what Ms. Blimline has told him.

THE COURT: Ms. Parsons, this whole matter co[illegible]e cleared up if your client comes in and b[illegible] the baby in.

MS. PARSONS: I know.

THE COURT: You yourself said that you spoke with her at least four times --

MS. PARSONS: No, with a neighbor, a friend.

THE COURT: With a neighbor or a friend, whoever it is, and she allegedly left her residence to come to court. She was to be here at one o'clock. That was two hours and 40 minutes ago. She has not appeared. You yourself told her according to what you told me that there was concern that the baby was dead. Quite frankly, that concerns the daylights out of of this court.

The child representative, Ms. Watts, has joined in with the Department of Social Services. Apparently, a decision was made to terminate the foster care relationship even in light of the finding by Dr. Eisenberg that it is not recommended that she regain custody of the child, because it does not appear that she is emotionally capable of providing the protection, nurturance, and care that would be required for the child's safety and security.

So, she is in need of intensive and extensive intervention both on emotional and social levels to help her deal constructively with not only her own internal issues but also those requirements for independent and self-sufficient functioning. What that tells me is we have a lady in a severe

crisis here. We also possibly have a dead child somewhere which just depresses me to no end, I am not going to kid you.

Since Master Price has recommended the issuance of a warrant, and I have to sign the warrant, I am going to sign the warrant. I'd like to get in touch with somebody in the Police Department to have them go out and take a look into this situation as rapidly as possible.

MS. BLIMLINE: Your Honor, we had a Homicide detective downstairs in Juvenile Court.

THE COURT: Is he still there?

MS. BLIMLINE: Detective James Jones.

THE COURT: Is he still there?

MS. BLIMLINE: He was there when we came up here. In fact, he said he was coming up.

THE COURT: Could you bring Detective Jones in here, please?

Let me have, if I may, please, Ms. Parsons, the addresses and the phone numbers that you have for Miss Bouknight.

MS. PARSONS: The last address I have is 1829 North Washington Street.

THE COURT: That's near Federal, isn't it?

MS. PARSONS: Zone 13.

THE COURT: That's near Federal. Go ahead.

MS. BLIMLINE: The social worker who just left would probably have the most up-to-date address.

THE COURT: What is the phone number you used to contact the client?

MS. PARSONS: The phone number is 327-8873.

THE COURT: And what is the phone number of the person who claimed to be a friend?

MS. PARSONS: That's it. The only phone number I have for Jacqueline is the phone number, this phone number which is not hers but is that of a friend or relative.

THE COURT: Do you know the name of that person?

MS. PARSONS: No, I don't.

MS. BLIMLINE: Your Honor, if it would be possible too, if the police were sent out, Dr. Eisenberg was concerned that this girl not be treated in any kind of threatening way. He said emotionally, she is functioning at about an eight to ten year old level. So, he feels, especially with the suicide threat she has made, which he thinks we all should take very seriously, he thought the best thing to do

was to deal with her as if she were a ten year old child, a very nonthreatening kind of approach.

I don't know what happens when the police go out and pick someone up. But if they could be made aware of, if we ever expect to find out what happened with the child, that we're going to have to treat this lady very gently, I think.

THE COURT: I had already come to that conclusion, Ms. Blimline. My problem is, I don't know where she is, and I don't know who is going to come in contact with her first and what the reaction she is going to have with that individual is going to be. And we are not picking her up for purposes of punishing her. We are picking her up in an attempt to find the child.

MS. BLIMLINE: But I am not sure she will know that. Ms. Parsons said the last time she called that number, she did inform her a bench warrant had been issued and the police were going to be looking for her.

MS. PARSONS: I did forget to say when I spoke with my client, I explained she had to be here. And she said, "Well, if I come, they just want me to come so they can snatch the child."

I said, "Well, there is no guarantee

they are not going to remove the child from your care if you come to court with the child." I said, "But they want to see the child, and they have an even bigger concern that there is something wrong with the child and that the child could be dead." And she said, "Oh, no." And I said, "Well, we can clear it up by just bringing the child in."

So, that was the conversation. She appeared absolutely horrified when I said that.

MS. BLIMLINE: Of course, she was aware already that was what we were suspecting, because the social worker had contact with her as I explained to you.

MS. PARSONS: I think she may be, if she is deliberately staying away, it is probably because she doesn't want to lose the child. She is afraid, and, of course, that is what is going to happen if she brings the child. The child will be removed.

THE COURT: What this court has to look at is what is in the best interest of this child. And quite frankly, that child is paramount on this court's mind. That child was born on October 3, 1986 which means the child is about 18 months old now, and the child is a baby. Based on all the information before the Court, it is obvious the child is in some

jeopardy because of the actions of the mother in refusing to bring her in. The very fact she has failed to come today tells me after you told her the reason for coming, that something is seriously wrong. And I can't shake that from my mind.

MS. BLIMLINE: The social wowrker also attempted to get in touch with medical clinics around the city to see if she has been bringing the child in for any kind of medical care, and he has not been able to locate one where the child has been seen.

THE COURT: Well, the motion to cite Miss Jacquline Bouknight for contempt is granted.

MS. PARSONS: Your Honor, I am sorry to interrupt, but I will oppose that on the basis that the mother has not been served, and we had not been given notice, neither she nor I. I just received the motion this morning but certainly have not had a reasonable time to prepare a defense. And the rules do require she be served, and certainly that I would have some time to prepare something on her behalf.

THE COURT: Once I bring the mother beefore the Court with the child, you will have all the time in the world. But until that child is safeguarded, I must overrule all of your objections at this time. The child's representative, Ms. Lisa

Watts, has joined in with the Department of Social Services, and in balancing the obligation of the Court to look out for the best interest of the child, I am persuaded the Court's action is appropriate at this time.

I obviously am not going to make a finding of a contempt. I am going to issue a contempt citation against her for failing to appear. She knew she was to be here today. She failed to appear. So, she will be cited for contempt.

I will issue the Order to Show Cause. The bench warrant will be signed by me as soon as it is presented to me. And I would like to have the detectives go out and try to pick her up in as unobtrusive a fashion as possible, keeping in mind that we have to find the child.

If she fails to produce the child, then I will order her held without bail in Baltimore City Jail until the child is found. I don't think I have much choice. If someone can give me some other reasonable alternative, I will be glad to consider it.

Ms. Parsons, you have no other alternative to the Court?

MS. PARSONS: No, I am sorry, I don't.

I've made the efforts I made to get her here. I don't know why she is not here.

THE COURT: Ms. Watts?

MS. WATTS: I really have no other alternative, Your Honor.

THE COURT: Ms. Blimline?

MS. BLIMLINE: I would again request the Court order she have an immediate psychiatric evaluation.

THE COURT: There is little question about that. Mr. Conti has indicated this is a lady in a crisis at this point, and the Court places great weight on Mr. Conti's views in that area. He has indicated he has reviewed the material which I have reviewed, and I am satisfied that his assessment is an accurate assessment, especially superimposing upon that what has happened between Ms. Parsons and her client today. What she has reported today frightens the daylights out of me. She was supposed to be here, and she failed to appear. That tells me something wrong may be going on.

Ms. Parsons, you have received a copy of the Order to Show Cause?

MS. PARSONS: Yes.

THE COURT: You cannot respond to it until

such time you have actually spoken with your client, I would believe. Would that be accurate?

MS. PARSONS: Yes.

THE COURT: Upon consideration of the Motion for Contempt, Petition for An Issuance of an Order to Show Cause, it is this 20th day of April, 1988 in the Circuit Court for Baltimore City, Division for Juvenile Causes, and the record should reflect this court is designated by Chief Judge Murphy, Court of Appeals, as the alternate Juvenile Court judge of Baltimore City, it is ordered that Jacqueline Bouknight, mother of the Respondent infant, show cause at an immediate hearing as soon as she is apprehended why the relief sought should not be granted, provided that a copy of the Motion for Contempt and Petition for the Issuance of the Order to Show Cause, this order be served on her immediately.

at one o'clock she was to be here, and she is not here. So, we can't serve her. So, what I am going to do is show cause at an immediate hearing. I am going to cross out on your copies, if you look at your copies, on April 20, 1988 at 1:00 p.m., and that you have an immediate hearing after apprehension, with the words to be inserted "before this court,"

why the relief sought should not be granted, and provided a copy of this order to be served on her immediately or as soon as possible. Cross out "at or before the immediate hearing on this matter" and insert the words "to be served on her as soon as possible." Is that acceptable?

MS. BLIMLINE: Yes, Your Honor.

THE COURT: All right. Good luck. I hope and pray we have some success in getting the warrant from Master Price, and I will ask to see the warrant as well.

MS. BLIMLINE: The worker should be back in a few moments, and he can give the Court other addresses of relatives.

THE COURT: The warrant is being signed by the Court at this time, and there will be no bail on the warrant, because I want this lady brought before me immediately.

(End of proceedings)

REPORTER'S CERTIFICATE

I, Carol J. Robinson, an Official Court Reporter of the Circuit Court of Baltimore City, do hereby certify that I stenographically recorded the proceedings in the mattter of IN THE MATTER OF MAURICE M___, in the Circuit Court for Baltimore City, Division for Juvenile Causes, Petition No. 88704202, before the Honorable EDWARD J. ANGELETTI, Judge, on April 20, 1988.

I further certify that the page numbers 2 through 28 constitute the official transcript of the proceedings as transcribed by me from my stenographic notes to the within typewritten matter in a complete and accurate manner.

In Witness Whereof, I have affixed my signature this 19th day of May, 1988.

Carol J. Robinson

Carol J. Robinson
Official Court Reporter

Mm's X 7
5/18/88

PROGRESS REPORT
CHILD IN PLACEMENT OR COURT ORDERED PROTECTIVE SUPERVISION

Date: May 13, 1988

For Period From: August 18, 1987 to May 5, 1988

Maurice L. M	10/3/86		8-18-87
(Child's Name)	(DOB)	(Docket No.)	(Date of Court Order)

Type of Court Order: Order of Protective Supervision

MOTHER: Jacqueline L. Boulnight
ADDRESS: 1726 N. Washington Street (Presently incarcerated)
TELEPHONE NO.:

FATHER: Terrence M. Miles
ADDRESS: (deceased as of 3/11/88)
TELEPHONE NO.:

1. Reason for placement. When and why child came into care.	Child Protective Service investigation initiated on 1/23/87 substantiated physical abuse and neglect. Maurice had suffered severe physical injuries while in the care of his mother.
2. Present placement. When it began. Adjustment of child.	Maurice was placed in Foster Care from 2/10/87 until 7/17/87. Maurice was ordered returned to the care of his mother by the Court on 7/17/87.
3. Agency contacts since last report. Dates and types of contacts. With whom and where.	See attached contact listings that combines contact by Foster Care, Child Protective Services and In-home Aide Services dating from the dispositional decision on 8-18-87.
4. Health (last medical exam., type of treatment and where, including medication, further needs).	On 7/17/87, Maurice received a medical examination at Chesapeake Health Plan upon his exit from Foster Care. Maurice had some problems with his ear due to teething, and had a cold. A prescription was provided. On 8/30/87, Maurice was seen at Francis Scott Key Emergency Room due to a high temperature. Prescription given. Mother filled prescription on 8/31/87 with assistance of Foster Care worker. No known subsequent medical appointments.

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5. School progress - grade, type of school and adjustment.	NOT APPLICABLE
6. Description of contacts between natural family and child. (Dates, with whom, purpose.)	SEE ATTACHED CONTACT LISTING.
7. Service plan for child's family. (What are the objectives agreed upon between relative and worker and what activities are needed to reach the objective/goal.)	Maurice [illegible]'s current whereabouts are unknown. His mother, Jacqueli Boulnight, has refused to disclose his whereabouts and has been found in contempt of court. Ms. Boulnight has been incarcerated since 4/26/
8. Financial support by child's parents.	☐ Supporting ☒ Not Suppor
AFDC-FC Status	☐ Eligible ☐ Ineligible
9. Other problems and/or comments.	
10. Direction indicated for child.	Every effort is being made by the Baltimore City Police Department an Baltimore City Department of Social Services to locate Maurice Miles. D.S.S. is requesting that Maurice be committed to the Department and placed in Foster Care as soon as he is found.

Prepared By: Phil Maguire Phil Maguire Date: 5-13-88
Social Services Center: Child Protective Services Phone No.: 361-2438
Supervisor's Signature: Merle Smith Merle Smith 5/18 Phone No.: 361-2108
DUE DATE - Next Reconsideration/Court Report: To be determined by the Court

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BOUKNIGHT, Jacqueline

DSS Contacts 8/18/87 through 3/3/88

8/18/87 Disposition Hearing; Child to remain with mother; Order of Protective Supervision; Intake CPS Worker obtains signed consent from Ms. Boukright to obtain written copy of the Psychologist's report; Family and Children's therapist had a copy but could not give such to the Department on 8-18-87.

8/20/87 Foster Care Worker T/C to Lilly Alston, Income Maintenance. She needs a memo explaining what happened at court so that Ms. Boukright can start receiving AFDC.

8/25/87 Foster Care Worker T/C from Mrs. Dixon, In-home Aide. Jackie Boukright is not receiving AFDC yet; In-home Aide H.V. Saw mother and child.

8/31/87 Foster Care Worker T/C to and H.V. with Boukright. Client requested Similac with Iron formula and diapers for Maurice. Maurice had 104° temperature and she took him to the doctor. Transported mother and child to get a prescripcion. Client requested a new MA card for Maurice; Foster Care Worker T/C and referral to Emergency Services. Took Ms. Boukright to 1500 Greenmount - 2nd floor;

Foster Care Worker T/C to WIC. WIC requested a letter saying that client applied for Emergency Food Assistance, give client some tokens, have her get a letter from the people she is staying with stating that they are providing housing and some food and have her bring these letters to the WIC office Wednesday morning on Eastern Avenue. Took Mother and child to Sears for clothing.

9/1/87 CPS Worker Appointment letter sent to Ms. Boukright at 1726 N. Washington Street.

9/4/87 Foster Care Worker T/C from J. Boukright. Ms. Boukright said she never came to pick up the forms for WIC and tokens because it was too hot. She wanted me to mail it to her. Mrs. Dixon, In-home Aide, comes every Tuesday morning from 8:30-11:30;

9/4/87 CPS Worker H.V. to Ms. Boukright and Maurice; Maurice appeared well-fed with good affect and hygiene. Service agreement discussed and signed by Ms. Boukright.

9/8/87 In-home Aide - H.V. Saw mother and child.

9/13/87 In-home Aide - T/C from J. Boukright stating Aide not needed today.

10/6/87 In-home Aide - T/C from J. Boukright stating Aide not needed today.

10/13/87 In-home Aide - H.V. with mother. Child not there.

11/4/87 In-home Aide - H.V.; Saw mother who said not needed today.

11/4/87 F.C. Worker T/C from client and attempted H.V. Ms. Boukright called and said she had a problem and requested a home visit. She said she knew she had to move in November but she will be moving today as soon as she gets her check. I told her I would be closing her case and that she has a P.S. worker but that I would come out. When I arrived, I was told that her grandfather had just taken her over to Apple's house. He said that he does not like the people she associates with and that one of them stole his T.V. Grandfather's name is John Brown.

BOUKNIGHT, Jacqueline

11/10/87 In-home Aide - unable to keep scheduled home visit with client.

11/17/87 In-home Aide - Attempted H.V. — no one responded.

11/24/87 In-home Aide - Attempted H.V. — no one responded.

11/25/87 CPS Worker - Attempted H.V. - no one responded.

12/1/87 CPS Worker - Sent appointment letter to schedule H.V. on 12/7/87.

12/7/87 Attempted T/C Contact. CPS Worker unable to keep appointment due to emergency in another case.

12/7/87 CPS worker - T/C contact with F.C. Worker; client reportedly has moved.

12/8/87 In-home Aide - Home Visit with mother; child was not there. Client stated she had moved to another residence and would call. Planned to go shopping next week.

12/10/87 In-home Aide - T/C - child answered the phone and said Ms. Boukright had just left.

12/14/87 In-home Aide - T/C with Ms. Boukright. The Aide wanted to schedule a home visit for 12/15/87. Ms. Boukright declined saying she was planning to see Maurice's father. The Aide had gifts for Ms. Boukright and Maurice. Ms. Boukright said she would call and tell her where to bring the gifts.

12/18/87 In-home Aide T/C with Ms. Brown. Was told Ms. Boukright did not live there anymore.

3/22/88 Informed by D.S.S./P.S. worker, Angela Collins (paternal relative) that Terrance Miles, father, has been shot to death on 3/11/88 at Washington and Lanvale Streets. Both parents alleged to be drug abusers. Ms. Boukright reported to be wandering about in a daze since the death of Mr. Miles.

All additional contacts were by CPS Worker.

*12/23/87 Attempted H/V by CPS Worker - no response.

2/5/88 Master File Clearance - attempt to locate new address. Old address still listed.

3/23/88: Emergency HV to Ms. Jacqualine Bouknight at 9 a.m. Ms. Bouknight not home. Worker spoke to former foster father of Ms. Bouknight, Mr. John Brown (DOB 3/3/16, SS#249-14-5253), who indicated that he was the principal tenant of 1726 N. Washington Stree and that Ms. Bouknight and Maurice were in residenc at his home and that he saw Ms. Bouknight and Mauri that morning around 9 a.m. and that both were in good health. Mr. Brown confirmed that Ms. Bouknigh was in a daze after the shooting death of Terrance Miles but that she was better and that he would not permit any harm to come to Maurice and that he had been helping Ms. Bouknight with parenting skills.

3/23/88: T/C to Foster Care Worker, Nancy Weaver; was referral source for Ms. Bouknight to Infant Study Program at U of Md. Hospital. Ms. Bouknight had 3 appointments in July and August, 1987. MA to provi transportation to and from hospital.

3/23/88: T/C to Ella Smith of Medical Records of Francis Sco Key Hospital; last appointment for Maurice 5/22/87, check-up, no special concerns noted. Appointment scheduled 9/9/87, no show.

3/23/88: T/C to U of Md. Hospital Infant Study Program, Director, Ms. Gundy (328-6975 or 828-2485 and 828-2

3/23/88: T/C to Ms. Barbara McGhee, Intake Specialist, U of Md. Infant Study Program (328-2485)

3/23/88: T/C to Ms. Rose Blum, Secretary, Family & Children' Society; no recent contact by Ms. Bouknight. Counselom, Leslie Morris and Carol Hubbard have lef Case closed on 7/31/87.

3/23/88: AMF clearance on Ms. Bouknight; current address for AFDC grant - 1726 N. Washington Street.

3/23/88: AMF clearance on paternal grandmother, Ms. Florence no current 30 case.

3/23/88: AMF clearance on Terrance M. Miles; last home addre 2250 Gable Avenue, SS#214-76-8970, food stamp case 30-635 304, case closed 11/1/87.

3/31/88: T/C to Ms. Jacqueline Bouknight (327-8873); no answ

4/7/88: Unannounced HV to Ms. Bouknight at 1726 N. Washingt Street; Ms. Bouknight stated that she was only visiting 1726 N. Washington Street, but that 1726 N. Washington Street was not her current addre Ms. Bouknight would not disclose her current addres to worker. Ms. Bouknight would not disclose whereal of Maurice to worker, even though informed that worker was responsible to court for Maurice. Ms. Bouknight stated that Maurice is with an aunt, whose name she would not disclose. Ms. Bouknight stated that Maurice was in Baltimore in her care. Ms. Bouknight stated that Maurice was seen at Francis Scott Key Hospital but would not state when.

Ms. Bouknight stated she was seeing another couns but would not disclose her counselor's name or t agency that her counselor was affiliated with.

Ms. Bouknight would not sign service agreement. Ms. Bouknight stated that she didn't care if the court was petitioned as she was not following the provisions of the Order of Protective Supervisio Ms. Bouknight stated that she would get physicall violent if her AFDC grant were suspended in the office of Social Services, as the worker explain that income could not go out to a child whose - whereabouts were unknown. When questioned why s would not let worker see Maurice or know of his whereabouts, Ms. Bouknight stated, "Social Servi likes snatching people's children." That she wa tired of being investigated and that I would nev see them (meaning Ms. Bouknight and Maurice) aga

4/7/88: Conference with PS Unit Head, Leslie Ogungbemi, who concurred with worker's plan to file emergen court petition and to contact every known relati

4/7/88: Emergency court review petition filed with Legal Resources person, Fran Burns.

4/7/88: T/C to Ms. Edna Gardner of Chesapeake Health Pla at the FSKH; last appointment by Maurice, 5/22/8 appointment scheduled in September, no show. May have been seen at Garwyn Medical Center (350 or 350-3484).

4/7/88: Unannounced HV to former address of Terrence Mil at 1623 N. Durham Street; message left; no one h

4/7/88: T/C to Parent Aide Supervisor, Ms. Gloria Dixon (X2076) to forward parent aide report

4/7/88: Attempted t/c to Parent Aide, Joanne Dix (X2075); message left.

4/7/88: T/C to Garwyn Medical Center (945-2200) at 2300 Garrison Boulevard, Baltimore 21216; Ms. Jan Thomas stated Maurice may have been seen by Dr. Francis or Dr. Clinton or Dr. Eric White (624-7800 or 563-4761) at 3240 Old Town Mall.

4/7/88: T/C to Ms. Kathy Ruzin, of Francis Scott Key Hosp Maurice last seen 8/30/87 for check-up in the ER.

4/7/88: Attempted t/c to Dr. Timothy Doran (550-0967)

4/7/88: Attempted t/c to Dr. Steven Cohen (955-6070)

4/7/88: Attempted t/c to Dr. Patricia Shearer of JHH (342-

4/7/88: T/C to JHH Social Worker, Rose Cariddi (955-8103) last contact with Maurice in 4/87.

4/7/88: T/C to Ms. Florence Dean (675-2683); last saw Mau in 9/87. Her son, Terrance Miles, was in North Carolina. Ms. Dean confirmed that her son, Terra Miles, was shot to death on 3/11/88.

4/8/88: T/C to Parent Aide Supervisor, Gloria Dixon; Ms. Bouknight had been addressed before Thanksgivi Case closed. Parent aide saw Ms. Bouknight in October and November, 1987. Went shopping with Ms. Bouknight. Ms. Bouknight first refused parent

4/8/88: HV to Ms. Lillie Mae Bouknight at 5116 Queensberry Avenue; message left regarding worker's concern about Maurice.

4/8/88: Attempted HV to Andrea Miles at 1430 Montpelier Street (243-8934); no answer; no doorbell or mail bc

4/8/88: T/C to Ms. Florence Dean at 675-2683 and 522-2100; no new information regarding Maurice.

4/8/88: T/C to maternal uncle, Charles Bouknight, at Traveler's Aid (685-3569); Mr. Bouknight had seen Ms. Bouknight recently. Would not disclose information including his own address to worker.

4/8/88: HV to 1307 N. Dallas Street, former address of Mr. Charles Bouknight; worker spoke to a Mr. Lee.

4/8/88: Attempted HV to Ms. Geneva McNeil at 1615 Biddle Str (243-8934); no answer.

4/8/88: Attempted HV to last AMF address for Mr. Miles - 2250 Gable Avenue; no such address.

4/11/88: T/C to Ms. Bouknight; not available; Maurice not with her (327-8873).

4/12/88: T/C to Ms. Bouknight; would not schedule time when worker could see Maurice.

4/12/88: At 4 p.m., worker advised by PS Supervisor, James Kc to file missing person's report with police.

4/12/88: Missing person's report or police report filed with Officer Charles Klein of Eastern District (396-2433) at 4:30 p.m. at 312 E. Oliver Street. Officer to go directly to Ms. Bouknight's address at 1726 N. Washington Street.

4/12/88: T/C to Ms. Lillie Mae Bouknight, paternal grandmothe 5116 Queensberry Avenue (466-4904); Ms. Lillie Mae Bouknight saw Maurice once in 10/86; has had no contact with Ms. Jacqueline Bouknight. No relative that she knew of in North Carolina but in South Carolina. Father, Charles Bouknight, in South Carol Maurice had 2 aunts, but Ms. Lillie Bouknight was certain that Maurice is not in their care. Ms. Lillie Mae Bouknight believed further that son, Charles Bouknight, had the most information and that he lived on Monument Street, although she did not know his address. Ms. Lillie Mae Bouknight not a relative resource.

4/12/88: T/C to Mr. Charles Bouknight at Traveler's Aid (685-3569); no recent contact with Maurice; would not discuss issue; would call worker at a later date.

4/14/88: T/C to Officer Charles Klein; spoke to paternal grandmother, Ms. Florence Dean, at 1003 N. Gay Street apt. 201 (675-2883 and 522-2100); Terrance Miles reportedly bringing child in March to Jacqueline Bouknight. Ms. Bouknight reportedly to move to North Carolina. Maurice may be in North Carolina. Officer Klein went to 4633 Reisterstown Road to see putative aunt, Louise Perry. Given wrong number by Ms. Bouknight. Ms. Bouknight stated to Officer Klein that she worked at Dial A Mate. Officer did not

Dial A Mate at 219 Joppa Road; no listing for Ms. Bouknight. No record at Baltimore G & E. Post Office to get back to Officer Klein regardi another address for Ms. Bouknight.

Officer Klein contacted a Louise Perry at 717 Dri Lake Drive, Apt. 206 (669-4319); no contact with Maurice. Stated that Ms. Bouknight lied.

4/12/88: T/C from Ms. Bouknight at 3:35 p.m. to DSS Screar Worker, Zachary Grant, regarding police visit to home.

4/13/88: T/C from Ms. Bouknight; upset regarding police vi to home. Ms. Bouknight stated Maurice in care of aunt whose name and address she would not disclos Ms. Bouknight stated that she was going to school during the day. Ms. Bouknight would not state a in the evening when the worker could see Maurice.

4/13/88: T/C to Officer Charles Klein at 396-2433; missing person's complaint number is 3D-26458.

4/13/88; OV with PS Unit Chief, Leslie Ogungbemi; worker directed to contact SAO. Letter to IM worker to suspend grant. Letter to Ms. Bouknight, informin of actions taken.

4/14/88: T/C from Officer Klein

4/15/88: T/C to Charles Bouknight at Traveler's Aid (685-3

4/15/88; T/C from Officer Klein at 4 p.m.; Officer Klein t refer case to Homicide to Sgt. Landsmann.(396-272: Ms. Louise Perry had never seen the baby. Case looks kinky. Officer thinks Ms. Bouknight d something that has hurt Maurice.

4/15/88: 4:20 office conference with PS Supervisor, Gwen Jc police involvement sufficient. Worker can do no more at this time, including contacting SAO. Possible relative in Columbia, South Carolina and Wynnboro, South Carolina.

4/15/88: 5:15 t/c to Officer Klein regarding any new inform

4/15/88; T/C to Charles Bouknight (685-3569); Mr. Bouknight stated he would not disclose information but that he would phone worker in his office around 1 p.m. on 4/18/88. Mr. Bouknight had not seen Maurice.

4/17/88: T/C to Officer Klein regarding progress of case

4/18/88: Unannounced HV to Ms. Bouknight at 1726 N. Washing Street at 12 noon; Mr. John Brown stated that he and a Shirley Davis and a Ramall Carter lived at 1726 N. Washington Street as well as Ms. Bouknight. Mr. Brown revised his story that he had seen Mauri on 3/23/88, to state that he had last seen Maurice one week previous to 3/23/88.

Mr. Brown stated on occasion, he put Ms. Bouknight out of his home as she allowed Mr. Terrance Miles to come into his home and steal his TV.

BOUKNIGHT, Jacqueline P&I

4/18/88: 1:30, this worker surprised Ms. Jacqueline Bouknig coming into the home. Ms. Bouknight was in the company of a man. Stated she was enroute to pick up Maurice and to take him to Francis Scott Key Cl to be seen by Dr. Doran and that she would return with Maurice at 4:30 p.m. on 4/18/88 to 1726 N. Washington Street, for the worker to see Maurice. Ms. Bouknight informed of the 4/21/88 1 court hearing.

4/18/88: T/C to Sgt. Stine of the Youth Division; Sgt. Stin to have police officer meet worker at 1726 N. Wash Street at 4:30 p.m.

4/18/88: Worker flagged Baltimore City Police Officer Opher of the Eastern District. Worker and Police Woman went to 1726 N. Washington Street. Only Mr. Brown at home. Mr. Brown stated that Ms. Bouknight but not Maurice had slept at 1726 N. Washington Street on the night of 4/17/88.

4/18/88: Alert submitted to Henry Hunt of Foster Care Intake and to Screening.

4/18/88: AMF clearance for Valerie Miles; no active case.

4/18/88: T/C to Sgt. Stine of Youth Divison (396-2042); case assigned to Det. Jones.

4/18/88: T/C to Charles Bouknight (685-3569) at 10a.m. Mr. Bouknight to call worker at 1 p.m./

4/18/88: Worker waited between 1 and 2 p.m. for phone call f Mr. Charles Bouknight; no call.

4/18/88: Attempted t/c to Andrea Miles, paternal aunt, who contacted DSS Supervisor, Merle Smith; who indicate she had not seen Maurice.

4/18/88: T/C to Det. James Jones; nothing new on case. Work suggested photograph of mother and to accompany Det. Jones. Det. Jones stated he would rely on cooperation of Ms. Bouknight. Worker emphasized the possibility of this being a murder case.

4/19/88: 9 a.m. office visit by Ms. Bouknight. Ms. Bouknight questioned this worker regarding court hearing for 4/20/88. "Are they going to snatch my child?" Worker replied that it was up to court. Ms. Bouknig replied, "that's all I wanted to know." Ms. Bouknig left the office. She then returned asking for token to go to school. In the waiting room Ms. Bouknight stated, "I'm going to kill myself. Are you going to put that in your record?" Worker replied, yes. Ms. Bouknight stated, "I'm going to kill myself after the court hearing. I won't have any reason to live without him. I won't have any reason to live then." Ms. Bouknight appeared to be on the verge of tears and an emotional breakdown. Worker gave Ms. Bouknight one token.

4/19/88: Case conference with Supervisor, Merle Smith. Worker not obliged to transport Ms. Bouknight to ment health facility but to inform Ms. Bouknight of such resources.

4/19/88: T/C to Mr. Charles Bouknight, Sr.; M-3, West Columbia Apts.; West Columbia, South Carolina (803)796-2538 at 9:20 a.m. Mr. Bouknight would not discuss Maurice with worker. Stated he did not have Maurice.

4/19/88: T/C to Charles Bouknight,Jr. (685-3569); had not seen child in a long time. Ms. Bouknight did not mention child. Mr. Bouknight believed Ms. Bouknig not capable of caring for child.

4/19/88: T/C to Det. James Jones and CV by Det. Jones

4/19/88: T/C to Charles Bouknight; address of his father an a Thomasina in North Carolina given to worker. Mr. Bouknight requested that these relatives not be contacted until after the 4/20/88 court hearing Worker stated urgent necessity of safeguarding chi and indicated that they would be contacted immedia

4/20/88: T/C to Mr. Charles Bouknight (803) 796-2538 at 11:: and 12 noon; no answer.

4/20/88: T/C to a Thomasina (803)799-3567; a man named John B. answered; not a relative; didn't know anyt but the person, Thomasina did live at that address.

4/20/88: T/C to Parent Aide Supervisor, Gloria Dixon; messa left.

4/19/88: Unannounced HV to Leslie Miles, paternal aunt, at 913 E. 30th Street; last saw Maurice at the 2000 b of Oliver and Gay Streets, in mid February, 1988.

4/20/88: Telegram sent to Thomasina Bouknight, regarding whereabouts of Maurice Miles. No personal delivery of telegrams for West Columbia or Charles Bouknight Operator #636.

4/20/88: Emergency court review hearing. Shelter care of Maurice granted to DSS by Master Tesette Price. Present - DSS Attorney, Marilyn Blimline; child's attorney, Lisa Watts, Legal Aid attorney for Mauric and Robin Parsons, OPD for Ms. Bouknight. Also present, Det. James Jones of the Youth Division, docket #887042023.

4/20/88: Motion for contempt and petition for the issuance of an order to Show Cause. Court hearing before Judge Edward Angeletti. Present - Marilyn Blimline, Lisa Watts, Robin Parsons, and this worker. Det. Jones not present although informed of court hearing.

Judge Edward Angeletti (396-3074 or 396-3075) issued a Show Cause Order. Ms. Jacqueline Bouknight to answer to the court why she was not present for court hearing of 4/20/88, although had personal service and signed summons and informed by her attorney, Robin Parsons, of the time and place of court hearing.

Judge Angeletti isused a bench warrant for Ms. Bouk and ordered that if Ms. Bouknight failed to produce child, she is to be locked up until she produces child. Warrant #16188. No bail on warrant.

Ms. Bouknight to be brought immediately before Judge Angeletti and be given an immediate psychological and psychiatric evaluation by the court medical officer, Nick Conti.

4/20/88: T/C to Det. James Jones; informed of court order. Det. Jones indicated that he had a copy of the w #161-88. Det. Jones reminded of life and death n of the case.

4/20/88: Alert and copy of Order of Shelter Care given to DSS screening person, Kenny.

4/20/88: Copy of OSC added to the Foster Care Alert to Foster Care Supervisor, Henry Hunt.

4/21/88: T/C and memo to IM Supervisor, Ms. Genevieve Hick (X3282) at Collington Square, to suspend AFDC gra of Ms. Bouknight and to alert her and district regarding Maurice. Copy of memo also sent to IM Worker, Ms. A. Johnson (X3257).

4/21/88: T/C to Sgt. Stine of Youth Division; Det. Jones h spoken to a Sheila Davis at 1729 N. Washington St who stated to Det. Jones that she had seen Mauric with Ms. Bouknight on that day.

4/21/88: T/C to Det. James Jones; Det. Jones advised that case should be regarded as a homicide and that no responsible employee of city or hospital had seen child.

4/21/88: T/C to Sgt. Stine of the Youth Division; Det. Jon looking for Ms. Bouknight at that moment.

4/22/88: 9a.m. t/c to Det. Jones

4/22/88: T/C to court clerk for Judge Angeletti; Eric McDo worker quoted Det. James Jones, "that mother is going to have to help us." Worker suggested some from Judge Angeletti's court to impress upon poli the severity of the case, that Ms. Bouknight, acc to Mr. Brown, did not stay at 1726 N. Washington Street on the night of 4/21/88.

4/22/88: T/C to Det. Jones, who spoke to a Ms. Sophronia Washington, niece of Mr. Brown, at 1726 N. Washin Street, on 4/21/88. Detective did not request photos of mother and child or want worker to accompany him to home as he had never seen Ms. Bou

4/22/88; T/C to Ms. Cindy Mrozak, clerk to Judge Angeletti; same concern related.

4/22/88; 3 p.m. t/c to Judge Edward Angeletti; Judge Angel suggested that either worker or police wait surreptiously outside the home at 1726 N. Washingt Street.

4/22/88: T/C to PS Supervisor, Merle Smith; Ms. Smith state waiting outside home not a PS worker's function. Worker had done all he could do.

4/22/88: 4:30 unannounced HV to 1726 N. Washington Street; worker spoke with a Norma Begett, age 20, 718 N. Bradford Street, no phone. Stated to this worker

that she had seen Ms. Jacqualine Bouknight around 1:30 p.m. by herself. Ms. Begett had no contact with Maurice.

4/22/88: Unannounced HV to Arthur Haynes at 1729 N. Washin Street regarding Ms. Bouknight and Maurice; Mr. H stated he had not seen Maurice recently.

4/22/88: T/C to Officer Klein regarding Ms. Bouknight; see at 1726 N. Washington Street.

4/25/88: T/C to Det. Jones

4/25/88: T/C from Det. Celio Olivares of the Youth Section to give case close scrutiny..

4/25/88: Attempted t/c to Officer Klein

4/25/88: T/C to Lt. Sweeney of Homicide

4/25/88: T/C to Sgt. Harding, Shift Commander at Eastern D to send an officer to 1726 N. Washington Street a night.

4/25/88: T/C to Ms. Hicks regarding suspension of AFDC mem

4/25/88: T/C from Det. Olivares; in need of photograph of Ms. Bouknight.

4/25/88: T/C to Ms. Hicks of Collington Square; permissibl for police to pick up photo.

4/25/88: T/C from Ms. Hicks; instructed by District Manage Thomas Piscitelli that photo ID of Ms. Bouknigh only be issued to worker or DSS personnel.

4/25/88; Visit to Collington Square District to Ms. Hicks; photo given to worker who gave photo to Det. Oliv and Jones.

4/26/88: T/C to Shift Commander, Sgt. Harding; Officer Klei went to 1726 N. Washington Street. Ms. Bouknight there. To have another officer try again on nigh of 4/26/88.

4/26/88: T/C with Det Rosinski, Chief of PS; Det Rosinski to contact Youth Divison of BCP on morning of 4/27 to request that greatest attention be given to the matter as it is a possible homicide.

4/27/88: T/C from Lt. Kibler of the Youth Divison (396-2042 Ms. Bouknight in police custody. Alert for child. During questioning, Ms. Bouknight mentioned the na of Michelle Jones in Lexington County, South Carol

4/27/88: T/C to Ms. Jeanette Scott, Executive Support Assis Division of Child Protective and Preventive Servic Columbia, South Carolina (803) 734-5670.

Ms. Scott to check out Thomasina (Brunson)
2-2 Allen Benedict Court, Columbia, S.C.
(803) 799-3567.
and Charles Bouknight, Sr., M-3 West Columbia,
South Carolina (803) 796-2538 and a Michelle Jones
in Lexington County, South Carolina.

4/27/88: 9 p.m. home t/c from DSS attorney, Marilyn Blimlin Court orders of Judge Angeletti not signed. Court hearing to be continued on 4/28/88. Address proff by Ms. Bouknight regarding a Barbara Bouknight. Initially information forwarded to Marilyn Blimlin indicated no such address.

4/27/88: T/C to Sgt. Caprinolle, of the women's lock-up in Central; warned about Ms. Bouknight's suicidal statements.

4/28/88: Attempted t/c to Ms. Jeanette Scott, DSS in Columl South Carolina (803) 734-6182. Worker spoke to Jeanette Diaz regarding information and investigat request by Baltimore City Police and DSS of the above mentioned addresses as possibilities regardi Maurice's whereabouts.

4/28/88: T/C from PS Worker, Ms. Margaret Hopkins, from the Richland County DSS in Columbia, South Carolina.

On 4/27/88, Ms. Hopkins made a HV to 2-2 Allen Ben Court, home of Mr. and Mrs. Johnny and Thomasina Brunson. Maurice not in their home. Ms. Hopkins also checked medical records at the Richland Memor Hospital and DSS records for both Ms. Bouknight an Maurice Miles for food stamps, AFDC or medical ass: No record.

Mr. and Mrs. Brunson knew Mr. Charles Bouknight, S: and although they are no relatives, Mr. Charles Bouknight addresses Mrs. Thomasina Brunson as aunt. Mrs. Brunson did not believe that Mr. Bouknight, Sr was caring for Maurice.

Adress of Ms. Margaret Hopkins - Richland County DS
Child Protective Services
2020 Hampton Street
Columbia, South Carolina 29204
Telephone # (area code 803) 256-4200, X105.

Ms. Hopkins did not have information regarding putative relatives in Lexington County.

4/28/88; T/C to Ms. Janet Diaz, Program Director, Child Protective and Preventive Services (803) 734-5670. Ms. Diaz to contact Ms. Jeanette Scott regarding the two workers sent out on 4/27/88 regarding both addresses.

4/28/88; T/C to Parent Aide Supervisor, Gloria Dixon, and Parent Aide, Joanne Dix; message left.

4/28/88: Interview by Det. Shawn Dashiell of the Youth Sectio at Central District regarding case record information.

4/28/88; Motion for contempt and show cause for non-appearanc on 4/20 and the non-production of child court hearing before Judge David B. Mitchell. Ms. Bouknight found in contempt and to be incarcerated until she purges her contempt by disclosing the whereabouts of her son, Maurice.

Present were DSS attorney, Marilyn Blimline; Legal Ai attorney for Maurice, Lisa Watts; Office of Public Defender attorney, Robin Parsons; Det. Shawn Dashiell of Youth Division, BCP; and Ms. Bouknight.

Also on 4/28/88, Jacqueline Bouknight was given an emergency evaluation for competency and dangerousness. Petition #88704202 by Jonas A. Rappaport, Chief Medical Officer of the Medical Services of the Circuit Court for Baltimore City (396-3013), and it was found by Dr. Rappaport that Ms. Bouknight understands the nature and consequenc of the charges against her and is able to assist her attorney in her defense. It was further stated that Ms. Bouknight is not currently dangerous to herself or the person or property of others. Ms. Bouknight was diagnosed as being a very angry, negativistic type of individual who frequently misunderstands what others are about and easily becomes involved in power struggles.

Ms. Bouknight stated that Maurice is with her siste at 3417 Denton Avenue, Dallas, Texas.

On 4/28/88, Lt. Kibler informed Det. Shawn Dashiell that a Barbara Bouknight did live at that address but that she had never seen Maurice other than a photograph of him when he was first born.

5/4/88 - T/C from Detective James Jones of the Youth Section, Baltimore City Police, 396-2042. Detective Jones requesting worker to meet with Detective Richard Fahlteich of Homicide Division of Baltimore City Police (9:50 a.m.)

5/4/88 - 11:00 a.m. - Interview of worker by Detective Richard Fahlteich of Homicide, Baltimore City Police at 500 East Baltimore Street, 396-2721.

5/5/88 - Detective Dashiell indicates that Charles Bouknight, Sr., M-3 West Columbia Apartments, West Columbia, South Carolina, (AC 803) 796-2438, and that the response was negative that Mr. Bouknight did now know of Maurice's whereabouts. Detective Dashiell indicated that Police were checking out fourteen different individuals with the name of Bouknight in South Carolina.

IN THE MATTER OF : IN THE
MAURICE M___ : CIRCUIT COURT
: FOR
: BALTIMORE CITY
: DIVISION FOR JUVENILE CAUSE
: PETITION NO.: 88704202

ORDER TO SHOW CAUSE

Upon consideration of the aforegoing Motion for Contempt and Petition for the Issuance of an Order to Show Cause, it is this 20 day of April, 1988, by the Circuit Court for Baltimore City, Division for Juvenile Causes,

ORDERED that JACQUELINE BOUKNIGHT, Mother of the Respondent infant, show cause at an immediate hearing ~~on April 20, 1988 at 1:00 P.M.~~ after apprehension before JUDGE EDWARD J. ANGELETTI, why th relief sought therein should not be granted, provided that a copy of the Motion for Contempt and Petition for the Issuance of an Order to Show Cause, and this Order be served on JACQUELINE BOUKNIGHT, Mother, ~~at or before the immediate hearing on this matter~~. as soon as possible.

/s/ Edward J. Angeletti
JUDGE

A- 0044

MATTER OF * IN THE
MAURICE M____ * CIRCUIT COURT
BORN: OCTOBER 3, 1986 * FOR
* BALTIMORE CITY
* DIVISION FOR JUVENILE CAUSE
* PETITION NUMBER: 88704202

MOTION FOR CONTEMPT AND PETITION FOR THE ISSUANCE OF AN ORDER TO SHOW CAUSE

Pursuant to Rule 910(e) of the Maryland Rules of Procedure, Petitioner, the Department of Social Services of Baltimore City (hereinafter referred to as the BCDSS), by it attorney, MARILYN E. BLIMLINE, petitions this Honorable Cour for the Issuance of an Order to show cause against JACQUELIN BOUKNIGHT, and in support of that petition alleges that:

1) On January 23, 1987, the BCDSS received a repo of suspected physical abuse of the Respondent. The BCDSS investigated this report from Dr. TIMOTHY DORAN of the Franc Scott Key Medical Center, and confirmed physical abuse and neglect of the Respondent while in the direct care and super sion of JACQUELINE BOUKNIGHT, the Respondent's mother.

2) On February 10, 1987, BCDSS obtained an Author tion of Shelter Care to prevent the Respondent from being released from the Francis Scott Key Medical Center to the ca of JACQUELINE BOUKNIGHT. On February 11, 1987, a petition

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filed by BCDSS, alleging the Respondent to be a Child in Need of Assistance. That same day a Shelter Care Hearing was held before Master Joyce Mitchell. Based on allegations of abuse and neglect of the Respondent, the Court issued Orders of Shelter Care on the Respondent for placement in foster care by the BCDSS.

3) On May 19, 1987, an Adjudicatory Hearing was held on the CINA Petition before Master Joyce Mitchell. A separate Dispositional Hearing was scheduled for July 17, 1987, and the Order of Shelter Care to BCDSS was continued until that date.

4) On July 17, 1987, the Dispositional Hearing was postponed pending the completion of a psychological examination of JACQUELINE BOUKNIGHT. The BCDSS' request for continuation of the Order of Shelter Care of the Respondent was denied by Master Joyce Mitchell, and this Respondent was returned to the care of his mother, pending Disposition.

5) A Dispositional Hearing was held on this matter on August 18, 1987, and the Respondent was found to be CINA and was placed under an Order of Protective Supervision to the BCDSS for placement with his mother with the following conditio

A. Progress reports every six months;

B. Mother shall cooperate with BCDSS;

C. Mother shall attend Center for Infant Studies at the University of Maryland until discharged;

D. Mother shall continue to utilize services of parent aide as provided by BCDSS;

E. Mother shall refrain from physically punishing the Respondent

6) The Respondent's mother has failed to cooperate with the BCDSS, in attempts to ensure the safety of the Respon dent in that she has repeateldy failed to inform the Petitione of the Respondent's whereabouts. On March 23, 1988, a home v was made to verify the safety of the Respondent, however, the Respondent's mother was unable to be contacted. MR. JOHN BRO the former foster father of JACQUELINE BOUKNIGHT, informed th Petitioner that he had seen the Respondent on March 23, 1988, the care of JACQUELINE BOUKNIGHT, and that Ms. Boukright resided in the home.

7) On April 7, 1988, a home visit was made and the Respondent's mother informed the Petitioner that the Responde was in the care of an aunt, however, she refused to identify the aunt or provide the whereabouts of the child.

8) On April 8, 1988, the Petitioner made attempts locate the Respondent through the following relatives: FLORENC DEAN, the paternal grandmother; ANDREA MILES, the paternal au LILLIE MAE BOUKNIGHT, the maternal grandmother, CHARLES BOUKNI JR., the paternal uncle. Each of these relatives report that they had not seen the Respondent for an extended period of t

9) The Baltimore City Police Department was contac on April 2, 1988, and a Missing Persons Report was filed on t Respondent by the Petitioner. The Respondent's mother mis- informed the investigating officer that the Respondent was in care of an aunt, LOUISE PERRY, however, Ms. Perry denies seei

After repeated attempts to ascertain the whereabouts of the Respondent from JACQUELINE BOUKNIGHT, this case was referred t the Homicide Division for further investigation due to concern over the welfare of the Respondent.

10) JACQUELINE BOUKNIGHT continued to refuse to disclose the whereabouts of the Respondent during a home visit made on April 18, 1988, by the Petitioner, as well as during a office visit made on April 19, 1988, at the BCDSS. Ms. BOUKNIGHT informed the Petitioner that she was going to kill herself, repeating a second time that she would kill herself following the Court hearing on April 20, 1988.

WHEREFORE, the Petitioner respectfully prays that th Court: 1) Issue the accompanying Order, directing Ms. JACQUELINE BOUKNIGHT to show cause why an Order adjudging her to be in comtempt shall not be passed; 2) Find the mother in contempt of Court; 3) Order Ms. JACQUELINE BOUKNIGHT to immediately produce the Respondent to the jurisdiction of the Court; 4) If the mother fails to produce the Respondent at t Adjudicatory Hearing, Order that the mother be found in direct Contempt and take whatever measures the Court feels is appropr including but not limited to incarceration and/or a fine; 5 Take such other relief as the nature of this cause may require

Marilyn E. Blimline

MARILYN E. BLIMLINE
Departmental Attorney
Department of Social Services of
Baltimore City
Legal Services Division
1510 Guilford Avenue
Baltimore, Maryland 21202
Telephone: 361-[illegible]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of April, 1988, a copy of the foregoing MOTION FOR CONTEMPT & PETITION FOR ISSUANCE OF AN ORDER TO S CAUSE was mailed to the following:

1. Robin Parsons, Esquire
   Public Defender's office
   201 St. Paul Place
   Baltimore, Maryland 21202
   - Attorney for Mother

2. Leonard Schwartz, Esquire
   Legal Aid Bureau
   714 E. Pratt Street
   Baltimore, Maryland 21202
   - Attorney for Respondent

Marilyn E. Blimline

MARILYN E. BLIMLINE
Departmental Attorney
Department of Social Serv
of Baltimore City
Legal Services Division
1510 Guilford Avenue
Baltimore, Maryland 212
Telephone: 361-2443